

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JAMAAL CAMERON; RICHARD BRIGGS;
RAJ LEE; MICHAEL CAMERON; MATTHEW
SAUNDERS, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

MICHAEL BOUCHARD, in his official capacity
as Sheriff of Oakland County; CURTIS D.
CHILDS, in his official capacity as Commander
of Corrective Services; OAKLAND COUNTY,
MICHIGAN,

Defendants.

Case No.: 20-cv-10949-LVP

Hon.: Linda V. Parker

DECLARATION OF ANTIONE HUTSON

I, Antione Hutson, declare:

I make this declaration based upon my own personal knowledge, and if called to testify, I could and would do so competently.

1. I am currently serving a sentence in Oakland County Jail. I am scheduled to be released in June. I am housed upstairs in the main jail building. It is like a dungeon here because it is disgusting and there is mildew everywhere. It smells like urine all the time. I am afraid to approach the sink to even brush my teeth because the sink is so dirty.

2. I am a black male suffering from multiple myeloma cancer and stage three kidney failure. With my conditions, I would not be able to be treated at the Jail if I got sick. I would have to be transported to a hospital.

3. There are a total of ten people in my cell. Some of the guys are coughing and sniffing. Nobody is monitoring these symptoms. There is no way to practice social distancing. The bunks are not even a foot apart. We can't even walk around the cell because it is so crowded.

4. Our cell is nasty, but we try to keep it clean, which is hard. There is mildew on the shower curtains. The trustees pass out equipment for cleaning. Earlier this week, a trustee brought us a broom and one bottle of DMQ. When handing me the DMQ, the trustee told me "They're only giving you one bottle today, and it's already watered down." We are not given gloves, masks, or sponges for cleaning. We spray the shower with DMQ and wipe it up with a torn up piece of towel.

5. We are supposed to receive soap on Monday, Wednesday, and Friday. Lately, we receive three small bars of soap per person on Mondays only. The bars are about half the size of a hotel bar of soap. We are expected to use what we are given for an entire week of showers, hand washing, and washing our undergarments and socks. We are not given enough soap for that. We usually run out after a couple of days. The commissary is closed, so there is no way to get more.

6. We are given toilet paper once a week, and we are not able to get more if we run out.

7. There are five or six blocks that are quarantined near mine. One block over from my cell (approximately ten feet away) is under quarantine, but the deputies leave the doors between the blocks open. We are all breathing the same air.

8. Our uniforms are changed once a week, on Sunday.

9. On April 24, 2020, signs were posted advising us to wash our hands for the first time, and we received masks for the first time.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

April 25, 2020

/s/Antione Hutson
Antione Hutson

*consent for signing given telephonically

Due to the COVID-19 crisis, it was not possible to obtain a written signature on the above declaration. I am an attorney admitted to the Eastern District of Michigan. On April 25, 2020, I personally spoke with Antione Hutson and read this declaration to him. Antione Hutson told me that the information in the above declaration is true, and gave me verbal consent to sign on his behalf.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

/s/ Syeda F. Davidson
Syeda F. Davidson